

Nicholas G. Sekas, Esq.
SEKAS LAW GROUP, LLC
530 Sylvan Avenue, Suite 201
Englewood Cliffs, New Jersey 07632
(201) 816-1333
Attorneys for Defendant 202 Marine LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FAIR HOUSING JUSTICE CENTER,
INC.; PATRICIA DELONE-FELIX;
STANLEY FELIX; BIANCA JONES; and
ROSLYN SEALE

Plaintiff,

v.

JUDA NIAYZOV; ALEVINA IOFFE;
EXCLUSIVE PROPERTIES REALTY,
INC.; NDERIM DEMIROVIC; 202
MARINE LLC; XUEQIANG ZHENG; YU
LI WENG; XIAN JIN ZHANG; and
REMAX EDGE REALTY, LLC

Defendants.

**CIVIL ACTION NO: 1:24-cv-
04201-LDH-TAM**

**DECLARATION OF
NICHOLAS SEKAS,
MANAGING MEMBER OF
DEFENDANT 202 MARINE
LLC**

I, Nicholas Sekas, declare the following under penalty of perjury pursuant to
28 U.S.C. § 1746:

1. I am the managing member of 202 Marine LLC, which owns the real
property at 202 Marine Avenue, Brooklyn, involved in this lawsuit.

2. 202 Marine LLC is a defendant in this action regarding a rental unit I personally listed to find a suitable tenant.

3. Throughout the course of my search for qualified candidates for the subject unit, I contacted numerous real estate agents/brokers via email and text message in hopes of them having a suitable candidate to rent the unit.

4. Attached hereto as Exhibit A is a true and accurate text message thread between myself and realtor/broker Adam Hamdan.

5. Attached hereto as Exhibit B is a true and accurate text message thread between myself and a realtor/broker known to me as Anita.

6. Attached hereto as Exhibit C is a true and accurate text message thread between myself and realtor/broker April Polis.

7. Attached hereto as Exhibit D is a true and accurate text message thread between myself and realtor/broker Danielle Latturolo.

8. Attached hereto as Exhibit E is a true and accurate text message thread between myself and realtor/broker Dina Homsy.

9. Attached hereto as Exhibit F is a true and accurate text message thread between myself and realtor/broker known to me only as Giovanna.

10. Attached hereto as Exhibit G is a true and accurate text message thread between myself and realtor/broker John Corrado.

11. Attached hereto as Exhibit H is a true and accurate text message thread between myself and realtor/broker Kimberly Kreuger.

12. Attached hereto as Exhibit I is a true and accurate text message thread between myself and realtor/broker Lori Tropa.

13. Attached hereto as Exhibit J is a true and accurate text message thread between myself and realtor/broker Louis Guida.

14. Attached hereto as Exhibit K is a true and accurate text message thread between myself and realtor/broker Monjurul Haque.

15. Attached hereto as Exhibit L is a true and accurate text message thread between myself and realtor/broker Nancy Sierota.

16. Attached hereto as Exhibit M is a true and accurate text message thread between myself and realtor/broker Nicholas Venezia.

17. Attached hereto as Exhibit N is a true and accurate text message thread between myself and realtor/broker Shanlee Scarlett.

18. Attached hereto as Exhibit O is a true and accurate text message thread between myself and realtor/broker Susan Aaron.

19. Attached hereto as Exhibit P is a true and accurate text message thread between myself and realtor/broker Theresa Forte.

Dated: May 14, 2025

By: *Nicholas Sekas*

Nicholas Sekas

202 Marine LLC Managing Member